



Department of the Treasury  
Internal Revenue Service

Peter Horowitz  
6412 Goldleaf Drive  
Bethesda, MD 20817

Date:

June 13, 2014

Taxpayer ID number:

Form:

TD F 90-22.1

Calendar year(s):

2007 & 2008

Person to contact:

N. Beasley

Contact telephone number:

313/234-1611

Employee ID number:

Dear Mr. Horowitz:

**Why we are sending you this letter**

This letter is to demand payment of the Report of Foreign Bank and Financial Accounts (FBAR) penalty assessed to you 6/13/2013, under section 5321(a)(5) or 5321(a)(6) of Title 31 of the U.S. Code. You previously received Letter 3709 explaining the reasons you owe this amount and how the penalty assessment applies to the facts and circumstances of your case.

**Account summary**

Calendar Year(s):	Current Balance:
12/31/2007	247,030.00
12/31/2008	247,030.00

Total: 494,060.00

**Payment instructions**

Within 30 days after the date of this letter, send a check or money order payable to the United States Treasury for the amount designated above. Include the following information on your check:

- 1.) FBAR (Report of Foreign Bank and Financial Accounts),
- 2.) Calendar year, and
- 3.) Social security number or employee identification number. Mail your payment to the following address:

Internal Revenue Service  
Detroit Computing Center  
P. O. BOX 33115  
Detroit, MI 48232-0115

Letter 3708 (Rev. 5-2013)  
Catalog Number 36613F

If you can't pay the amount in full within 30 days from the date of this letter, send what you can pay. If you want to apply for an installment agreement to make monthly payments on the amount due, let us know in writing with your payment. We will forward your request to pay in installments to the Department of Treasury's Financial Management Service for processing. If you pay in installments, you will be charged interest at the rate of 1 % per year and an additional debt servicing fee of approximately 18% of the penalty amount.

#### **Interest and penalties**

If you don't pay the amount owed in full within 30 days from the date of this letter, you will incur interest charges and a late payment penalty.

In accordance with 31 U.S.C. § 3717(a)-(d), interest will accrue at the rate of 1 % per year. Interest will begin to be charged as of the date of this letter if payment isn't received within 30 days. No interest will be charged if payment is received within 30 days from the date of this letter.

In accordance with 31 U.S.C. § 3717(c)(2), a late payment penalty charge of 6% each year will be assessed on any portion of the penalty that remains unpaid 90 days from the date of this letter.

Interest and penalties will be charged unless excused in accordance with 31 C.F.R. § 5.5.

#### **Collection costs**

In accordance with 31 U.S.C. § 3717(e)(1), if you don't pay the penalty in full within 30 days after the date of this letter, you may also be liable for additional costs associated with processing and handling a delinquent debt. See the section below on "Collection enforcement action" for more information about these additional costs.

#### **Collection enforcement action**

If you fail to remit payment within 30 days after the date of this letter, any of the following actions may be taken to enforce collection, which may result in additional costs to you:

- Referral to the Department of Justice to initiate litigation against you.
- Referral to the Department of the Treasury's Financial Management Service. (This referral involves an additional debt-servicing fee that is approximately 18% of the balance due.)
- Referral to private collection agencies. (Referral to a private collection agency increases the additional debt-servicing fee from approximately 18% to 28% of the balance due.)
- Offset of federal payments such as income tax refunds and certain benefit payments such as social security.
- Administrative wage garnishment.
- Revocation or suspension of federal licenses, permits or privileges.
- Ineligibility for federal loans, loan insurance or guarantees.

#### **Contesting the penalty assessment**

If you didn't request an administrative review of the penalty proposed in Letter 3709, or if new situations have occurred since your administrative review, you may still request a hearing in our Appeals Office. The hearing must be requested in writing, within 30 days from the date of this letter, by following the requirements provided in Letter 3709.

Mail your request to the following address:

Internal Revenue Service  
Detroit Computing Center  
P. O. BOX 33113  
Detroit, MI 48232-0113

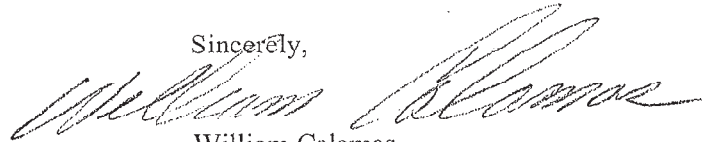
At the hearing, you may present any evidence to show you don't owe the debt, that the debt isn't delinquent, or that it isn't legally enforceable.

Besides this administrative review, if you want to try to recover FBAR penalties previously paid, you may be able to sue in the United States District Court or the United States Court of Federal Claims. For more information about filing suit in federal court, contact the clerk of your U.S. District Court or the U.S. Court of Federal Claims.

If you have questions, you can contact the person identified in the heading of this letter.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "William Calamas", is written over a horizontal line.

William Calamas  
CTR Operations Manager

Enclosures:  
Envelope  
Copy of this Notice